

FILED  
Clerk  
District Court

JUN 16 2006

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

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Attorneys for Defendant Justice Alexandro C. Castro

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

Plaintiff,

vs.

COMMONWEALTH OF THE  
NORTHERN MARIANA ISLANDS  
(hereafter referred to as the CNMI),  
NICOLE C. FORELLI, former Acting  
Attorney General of the CNMI, in her  
personal/individual capacity; WILLIAM C.  
BUSH, former Assistant Attorney General  
of the CNMI, in his personal/individual  
capacity; D. DOUGLAS COTTON;  
former Assistant Attorney General of the  
CNMI, in his personal/individual capacity;  
L. DAVID SOSEBEE, former Assistant  
Attorney General of the CNMI, in his  
personal/individual capacity; ANDREW  
CLAYTON, former Assistant Attorney  
General of the CNMI, in his  
personal/individual capacity; Other  
UNKNOWN and UNNAMED person or  
persons in the CNMI, in their personal/  
individual capacity; ALEXANDRO C.  
CASTRO, former Justice ProTem of the  
CNMI SUPERIOR COURT, in his  
personal/individual capacity; PAMELA S.  
BROWN, former Attorney General of the  
CNMI; in her personal/individual capacity;  
ROBERT A. BISOM; and JAY H.  
SORENSEN.

Defendants.

CIVIL ACTION NO. 05-0027

**DECLARATION OF KERISHNAN SAMY  
NAIDU IN SUPPORT OF DEFENDANT  
ALEXANDRO C. CASTRO'S RESPONSE  
TO PLAINTIFF'S NOTICE TO COURT  
TO CORRECT THE RECORD**

ORIGINAL

1 I, **KERISHNAN SAMY NAIDU**, certify as follows:

2 1. I make this declaration based upon my personal knowledge of the facts stated  
3 herein.

4 2. I am an employee for Civile & Tang, and handle administrative matters at the  
5 office located in Saipan, CNMI.

6 3. The mailing address for our CNMI Office is P.O. Box 10003, PMB 86, Saipan,  
7 MP 96950.

8 4. One of my responsibilities is to retrieve the mail which is delivered to the office's  
9 CNMI postal address.

10 5. This CNMI post office box number is a private postal service.

11 6. I was informed that when mail is delivered to the CNMI, it is received by the  
12 United States postal service, which forwards the mail to the private postal service.

13 7. As shown on the receipt for the package, it appears that the private post office  
14 employee signed for the package containing Plaintiff Bradshaw's Second Amended Complaint  
15 on April 6, 2006. *See* Exhibit A attached hereto.

16 8. The postal service did not notify me that they signed for the package containing  
17 Plaintiff Bradshaw's Second Amended Complaint and placed the package in our post office box.

18 9. On April 13, 2006, I opened an email (sent on April 12, 2006) from Mary Cruz,  
19 assistant to Attorney Patrick Civile, asking whether I received anything in the mail in the  
20 Bradshaw case.

21 10. On April 13, 2006, I checked the mail and received a package containing Plaintiff  
22 Bradshaw's Second Amended Complaint. At that time I did not notice that the Complaint had  
23 been received by the private postal service on April 6. I did not discover this until he requested a  
24 copy of the private postal service receipt several weeks later. After checking the mail on April  
25 13, 2006, I informed Ms. Cruz that I received the package and she instructed me to send the  
26 package to Attorney Civile's Guam office by overnight mail.

27 11. On that day, April 13, 2006, I sent the package via DHL to Attorney Civile's  
28 Guam office address, 330 Hernan Cortez Ave, Ste. 200, Hagatna, Guam 96910.

1  
2 12. A true and correct copy of the a Certified Mail Receipt from the CCM Mail  
3 Services, dated April 6, 2006, is attached hereto as Exhibit A.

4 I declare under penalty of perjury that the foregoing is true and correct.

5 Respectfully submitted this 16 day of June, 2006.

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9 **KERISHNAN SAMY NAIDU**  
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# EXHIBIT A

CCC MAIL SERVICE		ARTICLE NO.
ADDRESSED TO <i>G. Parrillo Civil</i>		BOX NO. <i>86</i>
YOUR MAIL IS: <input checked="" type="checkbox"/> LETTER <input type="checkbox"/> SMALL PACKET <input type="checkbox"/> PARCEL		
<i>Envelope</i>		
<input type="checkbox"/> EXPRESS <input type="checkbox"/> INSURED		PRINT NAME
<input checked="" type="checkbox"/> CERTIFIED <input type="checkbox"/> REGISTERED		SIGNATURE <i>[Signature]</i>
<i>7099 3220 0001 2872 1825</i>		DATE
REQUIRED PAYMENT : \$ _____		
<input type="checkbox"/> BOX RENTAL DUE _____		<input type="checkbox"/> OTHERS <i>06 APR 2006</i>